

PBW*Consulting Engineers
and Scientists***RECEIVED****2007 MAY 16 AM 9: 51****SUPERFUND DIV.
REMEDIAL BRANCH
(6SF-R)****PASTOR, BEHLING & WHEELER, LLC**
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664Tel (512) 671-3434
Fax (512) 671-3446May 11, 2007
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: April 2007 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.3 – Soil samples were collected from five background locations within the City of Freeport right-of-way along Marlin Avenue. Soil samples were also collected from 17 locations on off-site Lots 19 and 20. Evaluation of analytical data for soil samples collected from the on-site soil boring and surface soil sample locations was performed.
 - Subtask 6.6 – Evaluation of analytical data for surface water samples from four Phase 2 wetland sample locations north of Marlin Avenue was performed.
 - Subtask 6.7 – Evaluation of analytical data for sediment samples from 17 Phase 2 wetland sample locations north of Marlin Avenue was performed.
 - Acquisition of access to properties immediately north of Marlin Avenue within the background soil area (UAO Paragraph 72) – access to these properties, where five proposed background samples are located, has been denied by the properties'

**216724**

owner. It is our understanding that EPA is currently attempting to obtain access to these locations. We have been working with you to identify an alternative location for collection of the five additional background soil samples should EPA also be unable to obtain access to the original properties.

2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new data were received or generated during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:

- RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
 - Subtask 6.3 – Soil investigation – to be continued through additional soil sample collection, sample analyses, analytical data validation, and data evaluation.
 - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through additional monitoring well installation and development, groundwater sample collection, sample analyses, analytical data validation, and data evaluation.
 - Subtask 6.6 – Surface water investigation – to be continued through analytical data evaluation.
 - Subtask 6.7 – Sediment investigation – to be continued through analytical data evaluation.

4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 35% complete. The following delays were encountered this month:

(1) The aforementioned denial of access to five of the ten background soil sampling locations has delayed and is continuing to delay soil investigation activities. We are working with you to mitigate the length of this delay through your contact of the property owner, and through the evaluation of alternative background sample locations.

(2) Significant rainfall at the Site during April continued postponement of monitoring well installation activities that were scheduled to start in March. These activities have been tentatively rescheduled to begin on May 21, 2007. Should Site conditions persist in delaying these activities, we will evaluate relocation of proposed monitoring wells to more accessible areas, or possible use of alternative means of access to the proposed locations.

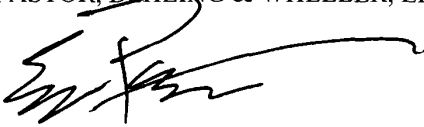
At present, it is uncertain how the above delays will affect the overall schedule for completion of the RI/FS.

Mr. Gary Miller
May 11, 2007
Page 3 of 3

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', with a long horizontal flourish extending to the right.

Eric F. Pastor, P.E.
Principal Engineer

Attachments

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology

cc: Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP